Message

From: Casey Frederick [CFrederick@HUNTREFINING.com]
Sent: 3/13/2018 5:59:53 PM
To: Dykes, Teresa [Dykes.Teresa@epa.gov]
Subject: RE: Hunt Consent Decree Civil No. CV-07-P-1777W

Sounds good. Thanks!
Casey

From: Dykes, Teresa [mailto:Dykes.Teresa@epa.gov]
Sent: Tuesday, March 13, 2018 12:52 PM
To: Casey Frederick <CFrederick@HUNTREFINING.com>
Subject: [EXTERNAL] RE: Hunt Consent Decree Civil No. CV-07-P-1777W

Casey- Good to hear from you. I think we can accommodate Hunt on these. I am a bit busy on calls/in meetings today. I will respond specifically in a bit and send you the presentation that you can share with ADEM. And I am happy to walk thru specific issues in a call with ADEM if you want.

If we do have a call, I would like the staff in Region 4 to participate with us. It has been a while- so I need to contact Region 4 and see who this person is.

Terri Dykes
Senior Attorney
Office of Enforcement and Compliance Assurance
1200 Pennsylvania Ave. NW
Washington, DC 20460
202.564.9883

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From: Casey Frederick [mailto:CFrederick@HUNTREFINING.com]
Sent: Tuesday, March 13, 2018 1:15 PM
To: Dykes, Teresa <Dykes.Teresa@epa.gov>
Subject: Hunt Consent Decree Civil No. CV-07-P-1777W

Dear Terri:

Hunt wants to begin exploring the termination of our Petroleum Refining Initiative Consent Decree (CD). First, we are in the process of renewing our Title V Permit for the Tuscaloosa Refinery and would like to ensure we have properly incorporated the CD requirements into the permit. I have spoken with our ADEM Air permit writer and she was asking about specific regulations to reference for the permit requirements. At one time, you had prepared a PowerPoint presentation which discussed translating CD requirements into Clean Air Act permits. Is that presentation, or something similar, available that we could provide to ADEM?

Our CD includes two asphalt refineries in Mississippi. The Lumberton facility ceased refining operations in early 2005 (prior to issuance of the CD) and operates as a terminal facility only. The equipment to operate as a refinery is no longer at the site and current permits include only operation as a terminal. CD requirements are prefaced as "Hunt shall undertake the following measures at Hunt's Refineries covered by this Consent Decree (except the Lumberton Refinery unless Hunt resumes petroleum refining operations at the Lumberton Refinery) ..." MDEQ has indicated the only reason the facility still needs a Title V Permit is because of requirements to incorporate CD limits into federally enforceable

permits. Would it be possible to eliminate obligations surviving the CD termination at this facility that is only permitted for terminal operations?

The Sandersville Refinery has permitted limits to remain below the major source threshold applicability for HAPS. Pursuant to the CD, Hunt accepted applicability as a major source for purposes of demonstrating compliance with Refinery MACT I (40 CFR Part 63, Subpart CC) and Asphalt MACT (40 CFR Part 63, Subpart LLLLL). Would Hunt be precluded from taking advantage of EPA's recent withdrawal of its "once in, always in" MACT policy due to the CD requirement for applicability of these two rules?

Any guidance you could give on the above issues, or any other advice on CD termination, would be appreciated. I can be reached by phone at (205) 391-3376 or by email at cfrederick@huntrefining.com.

Thanks,
Casey

Casey Frederick
Hunt Refining Company

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